

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
LAUREN HABETZ,

Plaintiff,

-against-

SCOTIA CAPITAL (USA), INC.,

Defendant.
-----X

Index No.:

SUMMONS WITH NOTICE

**VENUE
NEW YORK COUNTY**

**BASIS OF VENUE
Defendant's Place of Business and
Location of Events or Omissions**

TO THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney, at the address stated below, a notice of appearance or demand for a complaint.

If this Summons with Notice was personally served upon you in the State of New York, the answer must be served within twenty (20) days after such service of the Summons with Notice, excluding the date of the service. If this Summons with Notice was not personally delivered to you within the State of New York, the answer must be served within thirty (30) days after service of this Summons with Notice is completed as provided by law.

PLEASE TAKE NOTICE THAT the nature of this action is employment discrimination on the basis of Plaintiff's gender, pregnancy, caregiver responsibilities, sexual harassment, hostile work environment, and retaliation in violation of Title VII of the Civil Right Act of 1964, the New York State Human Rights Law, the New York City Human Rights Law and the Louisiana Employment Discrimination Law; as well as unequal pay in violation of the Fair Labor Standards Act ("FLSA") 29 U.S.C. §§ 201 et seq., as amended to include the Equal Pay Act, 29 U.S.C. §§ 206(d) et seq., and the New York Labor Law.

The relief sought is: an amount to be determined at trial but in no event less than Seven Million Five Hundred Thousand Dollars (\$7,500,000.00) together with attorneys' fees and interest thereon.

PLEASE TAKE FURTHER NOTICE that if you do not serve a notice of appearance or demand for a complaint within the applicable time limitation stated above, a judgment will be entered against you, by default, for the sum of Seven Million Five Hundred Thousand Dollars (\$7,500,000.00) together with interest, attorneys' fees and the costs and disbursements of this action.

The action will be heard in the Supreme Court of the State of New York, in and for the County of New York. The basis for venue, pursuant to CPLR § 503, is Defendant's place of business and location of its principal office in New York County as well as the county where a substantial part of the events or omissions giving rise to the claims occurred.

**Dated: New York, New York
January 29, 2021**

GODDARD LAW PLLC
Attorneys for Plaintiff

By: /s/ Megan S. Goddard
Megan S. Goddard, Esq.
39 Broadway, Suite 1540
New York, New York 10006
(646) 504-8363
Megan@goddardlawnyc.com

TO: SCOTIA CAPITAL (USA), INC.
250 Vesey Street
New York, New York 10281

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- X

LAUREN HABETZ,	:	
	:	
Plaintiff,	:	Index No. 151059/2021
	:	
-against-	:	NOTICE OF APPEARANCE
	:	AND DEMAND FOR
SCOTIA CAPITAL (USA) INC.	:	SERVICE OF THE
	:	COMPLAINT
Defendant.	:	
	:	
	:	
-----	X	

PLEASE TAKE NOTICE that Weil, Gotshal & Manges LLP hereby appears in this action on behalf of defendant Scotia Capital (USA) Inc. and demands that you serve a copy of the complaint pursuant to CPLR 3012(b) within 20 days of service of this demand as well as all notices and other papers in this action upon the undersigned at the address stated below.

Dated: New York, New York
March 2, 2021

WEIL, GOTSHAL & MANGES LLP

Nicholas J. Pappas

Nicholas J. Pappas
767 Fifth Avenue
New York, New York 10153
(212) 310-8669
Nicholas.pappas@weil.com

*Attorney for Defendant Scotia Capital
(USA) Inc.*

TO: Megan S. Goddard
39 Broadway, Suite 1540
New York, New York 10006
(646) 504-8363
Megan@goddardlawnyc.com

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----	X	
	:	
LAUREN HABETZ,	:	
	:	
Plaintiff,	:	Index No. 151059/2021
	:	
-against-	:	
	:	STIPULATION
SCOTIA CAPITAL (USA) INC.	:	EXTENDING TIME TO
	:	FILE COMPLAINT
	:	
Defendant.	:	
	:	
-----	X	

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. Plaintiff's time to file her Complaint shall be extended to April 21, 2021.
2. The deadline for Defendant to answer, move or otherwise respond to the Complaint shall be 60 days after the filing of the Complaint.
3. This Stipulation and Order may be modified by mutual agreement of the parties, subject to Court approval, or by motion for good cause shown
4. Entry into this Stipulation shall not prejudice or adversely affect any other rights, claims, or defenses of any party, and all other rights, claims, and defenses (and responses thereto) are expressly preserved by the parties.

IT IS FURTHER STIPULATED AND AGREED, that this Stipulation may be executed in counterparts and such counterparts together shall constitute the entire Stipulation. Fax/email signatures shall be deemed originals.

Dated: New York, New York
February 19, 2021

GODDARD LAW PLLC

By: *Megan Goddard*
Megan S. Goddard

39 Broadway, Suite 1540
New York, New York 10006
(646) 504-8363
Megan@goddardlawnyc.com

Attorney for Plaintiff

WEIL, GOTSHAL & MANGES LLP

By: *Nicholas J. Pappas*
Nicholas J. Pappas

767 Fifth Avenue
New York, New York 10153
Phone: (212) 310-8669
Nicholas.pappas@weil.com

*Attorney for Defendant Scotia
Capital (USA) Inc.*



NYSCEF - New York County Supreme Court Confirmation Notice



The NYSCEF website has received an electronic filing on 03/02/2021 01:58 PM. Please keep this notice as a confirmation of this filing.

151059/2021

Lauren Habetz v. Scotia Capital (USA), Inc.

Assigned Judge: None Recorded

Documents Received on 03/02/2021 01:58 PM

Doc #	Document Type
-------	---------------

4	STIPULATION - OTHER Stipulation Extending Time to File Complaint
---	---

Filing User

Nicholas J Pappas | nicholas.pappas@weil.com | 212-310-8000
767 Fifth Avenue, Ny, NY 10153

E-mail Notifications

An email regarding this filing has been sent to the following on 03/02/2021 01:58 PM:

MEGAN S. GODDARD - Megan@Goddardlawnyc.com

NICHOLAS J. PAPPAS - nicholas.pappas@weil.com

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile